

FILED  
CLERKS OFFICE

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

PREMIER CAPITAL, LLC, ) 2005 JAN 21 A 11:27  
v. )  
Plaintiff, ) U.S. DISTRICT COURT  
v. ) DISTRICT OF MASS.  
Defendants. ) CIVIL Action No.  
 ) 03-CV-12497-NG  
BEVERLY JOHNSON PENZELL, d/b/a )  
Law Office of Kris E. Penzell; )  
and BEVERLY JOHNSON PENZELL, as )  
Personal Representative of the )  
Estate of Kris E. Penzell, )  
SUSAN I. NOE, and VICTOR K. )  
RONES, )  
Defendants. )

MOTION FOR LEAVE TO FILE A DAY LATE  
MOTION TO AMEND COMPLAINT

Plaintiff Premier Capital, LLC ("Premier"), by its attorneys, moves for leave to file its Motion to Amend Complaint a day late. As grounds, Premier states that its counsel had planned to file the Motion to Amend electronically, and has registered with the Court in this regard, but has yet to receive "logins and passwords" to do so (see attached e-mail). Such login data was not available to counsel today, but is forthcoming, according to the Court's CM/ECF personnel.

WHEREFORE, Premier requests that the Court allow its Motion to file its Motion to Amend a day late, by overnight mail. (The motion papers are included herewith.)

PREMIER CAPITAL, LLC

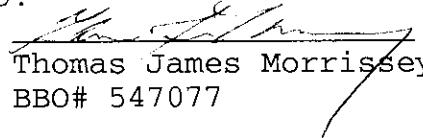
By its attorneys,

  
Miles E. Hoisington  
BBO# 545184  
Thomas James Morrissey  
BBO# 547077  
Hoisington and Morrissey P.A.  
1506 Drift Road  
Westport, MA 02790  
Tel.: (508) 636-7363

Dated: January 20, 2005

CERTIFICATE OF SERVICE

The undersigned, counsel for the plaintiff Premier Capital, Inc., certify that I served a copy of the foregoing Motion upon counsel of record for defendant Beverly Johnson Penzell, Posternak, Blankstein & Lund, L.L.P., Prudential Tower, 800 Boylston Street, Boston, Massachusetts 02199-8004, and Steven A. Sussman, Esq., 6 Beacon Street, Suite 400, Boston, MA 02108 by overnight mail, postage prepaid, this 20th day of January, 2005.

  
Thomas James Morrissey  
BBO# 547077

Subj: CMecf Registration Results  
Date: Jan/18/2005 7:23:00 AM Eastern Standard Time  
From: CMecfRegistrar@mad.uscourts.gov  
To: TMorris423@aol.com  
Sent from the Internet (Details)

Dear TMorris423@aol.com,

Thank you for registering for CM/ECF with the US District Court for the District of Massachusetts. Your application information has been successfully entered into our registration database.

Information regarding the distribution of logins and passwords is currently posted on our website. Once your application information is verified, it will be updated in the CM/ECF database and your login and password information will be distributed shortly after. Updates to this process will be posted on our website.

<http://www.mad.uscourts.gov/>

Computer based training modules are available on our website:

<http://www.mad.uscourts.gov/ecf22/index.html>

\*\*\*This message was automatically generated in order to verify your email address because you registered for CM/ECF with this court. Please DO NOT reply to this message.\*\*\*